

I had planned to attend this meeting in person, but am not able to. Here are my quick written comments on proposals 224,225,226,227 and 228 instead. These proposals would effect the commercial pot shrimp fishery.

I have been participating continuously in the Southeast commercial pot shrimp fishery for over a decade. While not my primary fishing income, the fishery is an important part of my business.

During the last BoF meeting on Southeast shellfish, the Board voted to fundamentally change the fishery by moving the start date from October 1 to May 15. This was done largely in an effort to address falling harvest levels, by delaying the fishery until after the shrimp have spawned, and also brought the Southeast fishery into line with the spot shrimp fisheries in British Columbia, Washington and PWS. I didn't participate in the discussion around this change, and it took me, and many permit holders, by surprise. While we did lose a season in the change, I believe it was well worth it. Though it is too early to see if this will result in an increase in biomass and a corresponding increase in GHGs, it seems a logical and likely result. And given that the health of the shrimp populations has been one of the primary concerns in the fishery, it seems like a logical step to have taken. This change has brought with it ancillary benefits, including safer fishing conditions by avoiding fall storms, and improved markets, both by allowing for an egg free product that is more desirable by most, and by aligning the season with the annual influx of visitors into the region, and so providing a huge direct marketing opportunity.

I sell IQF, tailed product both locally and to retailers and wholesalers on the west coast and in the Midwest. After two seasons of spring fishing, I have had only praise and glowing reports for the product. Customers really like the eggless product, and while there may be a marginally higher rate of soft shelled shrimp, the overall production in spring is cleaner and seems to be preferable in the market.

For these reasons, I would like to see the season start date stay at May 15, and so I **oppose proposals 224 and 225**. The fishery needs time under the new regime to see if there is a measurable increase in biomass.

Proposal 226 seeks to address the falling GHGs that can be seen over a decades long timeline by offering a 20% reduction across all districts. GHGs are set based on the best available information by the department, in an effort to provide a sustainable yield of the resource. I do not think the board should tie the departments hands on managing the fishery by mandating an across the board reduction like this. While I do believe that in retrospect, harvests were too high in this fishery in the past, I am hopeful that the department has gotten a better handle on not just commercial, but sport, subsistence and personal use harvest in recent years, and that the current commercial GHG is more reflective of what the population can sustain. Indeed, the GHG has shown far less volatility in the last decade than in prior periods.

The second part of proposal 226 would reduce the allowed gear per permit by "40 to 50%". This would appear to have no impact on the health of the population, in fact it would likely have a detrimental effect by encouraging participants to run their now much reduced gear more often. As is noted in the departments management report, allowing gear to sit longer - ideally overnight - allows the legally required mesh size to sort out smaller shrimp, as they are thought to be pushed out by the larger shrimp. This theoretically helps to protect smaller shrimp - two year classes according to the department report - from over harvest, and thus contributes to the sustainability of the fishery. By reducing the amount of gear each permit can fish without limiting participants to a single gear pull per day, I believe this part of this proposal would end up having an adverse effect on the shrimp population by increasing the likelihood of gear being ran more frequently.

The final part of proposal 226 would phase out the use of the larger pot size. I am not sure what the impact of this would be, and so am neutral on this aspect of the proposal.

I **oppose proposal 226** because I would like the department to continue to base their GHGs on the best available data, and also do not believe that reducing the pots per permit

would have a positive impact on the fishery absent additional regulation to limit pot hauls per day.

Proposal 227, by the same author as 226, seeks to allow the use of additional gear on a single vessel if an additional permit holder is on board. This proposal aims to reduce the number of pots fishing in an effort to reduce pressure on the population. While I do agree with the author that there is both an excess of participation in the shrimp fishery and concern for the underlying health of the population, I do not see this proposal as helpful in resolving either of these issues. Given that the fishery is managed to catch as close as possible to the GHL in each district, the number of participants or number of pots is largely immaterial to the impact on the populations. Unless conditions are made so burdensome as to make it economically non-viable, the GHL will be caught. Likewise, I do not see this proposal alone resulting in a decrease in pots in the water through consolidation onto fewer boats. There are far too many latent permits in the fishery for this to actually reduce participation. For these reasons, I **oppose proposal 227**.

I **support proposal 228**, which would allow for the use of slinky pots in the fishery. While I do not believe this would have a huge impact on the fishery, I do think it would be worth allowing fisherman to try these new pots and see if they offer any real improvements for the fleet.

Unlike the black cod fishery, where slinky pots have seen rapid adoption, there is no driving force like whale predation that needs to be addressed in the shrimp fishery. Also, it is a much less lucrative fishery, making participants less likely to spend money on new gear unnecessarily. That said, slinky pots might work great for some participants, and it doesn't seem problematic to allow their use.